Commander, Navy Region, Mid-Atlantic TRO-60280 Statement of Basis Page 1

COMMONWEALTH OF VIRGINIA Department of Environmental Quality Tidewater Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Oceana Naval Air Station, Dam Neck Annex Virginia Beach, Virginia Permit No. TRO 60280

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Commander, Navy Region, Mid-Atlantic has applied for a Title V Operating Permit for its Dam Neck Annex facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact:	Date:
Air Dormit Monogory	Date:
Air Permit Manager:	Date
Regional Permit Manager:	Date:

FACILITY INFORMATION

Permittee

U.S. Navy Commander, Navy Region, Mid-Atlantic Public Works Center Regional Environmental Group (code 970) 9742 Maryland Avenue Norfolk, Virginia 23511-3095

Facility

Dam Neck Annex Dam Neck Road, east of General Booth Blvd. Virginia Beach, Virginia 23461-5200

ID No. 51-810-00006

SOURCE DESCRIPTION

SIC code: 9711 – National defense. The facility is a Title V major source of Sulfur Dioxide. This source is located in an attainment area for all pollutants, and is a potential major source. The facility was previously permitted under a Minor NSR Permit issued on June 8, 1981, May 2, 1985, June 16, 1986, April 6, 1987, July 7, 1997 and amended on May 19, 1999. The primary sources of air emissions at the Dam Neck Annex are large industrial boilers fired with No. 4 fuel oil and alternatively with natural gas when available. The existing permit for the boilers allows fuel oil with a sulfur content of 1.5% to be burned throughout the year, thereby creating a major source of sulfur dioxide emissions. The primary utilization of the boilers is for space heating with the steam that is produced. This scenario is characterized by heavy fuel usage in the winter months and boiler shutdown during summer conditions. Still, the calculation of the potential emissions of SO2 makes this a major source for permitting. Other equipment that is significant for products of combustion, VOC's or particulate includes generators, one gasoline station, multiple solvent degreasing units, and several woodworking shops. The gas station, GSTA-575 has been equipped with Stage II vapor recovery by the Navy as a pollution prevention initiative, although not required by the regulations.

The Dam Neck Annex has average annual emissions at minor source levels and could become a minor source and avoid Title V status by converting to distillate oil usage and taking a sulfur limit of less than 0.5%, among other permit limits that would be necessary.

COMPLIANCE STATUS

The facility is inspected once a year. The source is currently in compliance with the NSR permit issued May 19, 1999.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission	Stack	Emission Unit	Size/Rated	(PCD)	PCD	Pollutant	Applicable
Unit ID	ID	Description	Capacity*	Description	ID	Controlled	Permit Date
Fuel Burning	Equipm	ent					
BOIL-529A	529A	E. Keeler Co. NB5429 (1981)	47 mmBtu/Hr	none	N/A	none	May 19, 1999
BOIL-529B	529B	Nebraska Boiler NSE555 (1988)	71 mmBtu/Hr	none	N/A	none	May 19, 1999
BOIL-529C	529C	Nebraska Boiler NSE555 (1988)	71 mmBtu/Hr	none	N/A	none	May 19, 1999
BOIL-442	442	Kewanee Boiler, H- 205KX (1942)	2.6 mmBtu/Hr	none	N/A	none	none
ICGF-355	355	Detroit Diesel 572RSL (1992)	600 KW	retard timing	N/A	NOx	none
ICGF-469D	469D	Caterpillar EDG- 3508 (2001)	1000 KW	retard timing	N/A	NOx	none
ICGF-469E	469E	Caterpillar EDG- 3508 (2001)	1000 KW	retard timing	N/A	NOx	none
ICGF-529B	G529 B	Caterpillar 3516 engine (1995)	1600 KW	retard timing	N/A	NOx	May 19, 1999
CHMC- GRP1	N/A	Solvent degreaser group	N/A	Work practices	N/A	VOC	none
Process A							
GSTA-575	N/A	Navy Exchange Gasoline Station	N/A	Stage 1	N/A	VOC	none
Process B							
WOOD-336	336	Woodworking Shop	N/A	Dust collector	N/A	PM	none
WOOD-526	526	Woodworking Shop	N/A	Dust collector	N/A	PM	none
WOOD-619	619	Woodworking Shop	N/A	Dust collector	N/A	PM	none

EMISSIONS INVENTORY

A copy of the 1998 annual emissions update is attached. Emissions are summarized in the following tables.

1998 Actual Emissions from the annual emission update

	1998 Criteria Pollutant Emission in Tons/Year				
Emission Unit	VOC	СО	SO_2	PM_{10}	NO_x
ALL					
Total	23.6	4.4	13.6	9.8	16.4

1998 Facility Hazardous Air Pollutant Emissions

Pollutant	1998 Hazardous Air Pollutant Emissions in Tons/Yr
none are apparent	trace amounts only

EMISSION UNIT APPLICABLE REQUIREMENTS - [BOIL-529A, BOIL-529B and BOIL-529C]

Limitations

These conditions are contained in a NSR permit issued to the facility on July 7, 1997 and amended on May 19, 1999.

Condition #6 limits the fuel throughputs for boiler 529A.

Condition #7 limits the fuel throughputs for boilers 529B and 529C.

Condition #11 lists the approved fuels; No. 4 fuel oil and natural gas for the boilers.

Condition #14 establishes the emission limits for the boiler, boil-529A, as:

TSP	2.3 lbs/hour	4.4 tons/year
PM10	2.1 lbs/hour	4.0 tons/year
SO2	73.4 lbs/hour	135.0 tons/year
CO	1.6 lbs/hour	5.5 tons/year
NOx	6.6 lbs/hour	21.9 tons/year

Condition #15 establishes the emission limits for the boilers, boil-529B and boil-529C, as:

TSP	3.5 lbs/hour	4.4 tons/year
PM10	3.1 lbs/hour	4.0 tons/year
SO2	110.9 lbs/hour	135.0 tons/year
NOx	9.9 lbs/hour	21.9 tons/year

Condition #19 sets the opacity limits for the boilers as 20% and 30%.

Condition #23 prescribes the location of test ports for the boilers.

Condition #24 sets the sulfur limit for the No. 4 fuel oil burned in the boilers.

Condition #26 describes the proper operation and maintenance of the boilers.

Condition #27 describes the training of boiler operators and the retention of training records.

Condition #28 lists the required records to show boiler compliance with the permit.

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-40-900, Existing Source Standard for particulate emissions

9 VAC 5-40-930, Existing Source Standard for sulfur dioxide emissions

Periodic Monitoring

The monitoring and recordkeeping requirements in Condition 23 of the NSR permit have been modified to meet Part 70 requirements. The limited monitoring of emission units at the Dam Neck Annex is currently limited to the opacity observations of the fuel burning equipment.

Monthly visual evaluations of each boiler are required monitoring.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include Names of fuel suppliers, dates of fuel deliveries, volume of each delivery, ASTM statement and the percent sulfur of each shipment of oil received. In addition, a logbook will be kept to record any instances of required Method 9 VEE's, the results of any such observations, any corrective action taken and the results of the corrective action.

Testing

The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The permit includes quarterly fuel quality reports to the Tidewater Regional Office.

Streamlined Requirements

There are no streamlined conditions for the boiler operations.

EMISSION UNIT APPLICABLE REQUIREMENTS - [ICGF-529B, ICGF-355, ICGF-469D and ICGF-469E]

Limitations

These conditions are contained in a NSR permit issued to the facility on July 7, 1997 and amended on May 19, 1999.

Condition #3 requires the fuel injection timing for ICGF-529B be retarded by 4 degrees to limit the emission of Nitrogen Oxides.

Condition #8 limits the fuel throughput for generator ICGF-529B

Condition #12 lists the approved fuel for the generator as distillate oil.

Condition #16 establishes the emission limits for the diesel emergency and peak shaving generator; ICGF-529B, as:

TSP	3.9 lbs/hour	2.2 tons/year
PM10	3.9 lbs/hour	2.2 tons/year
SO2	8.1 lbs/hour	4.6 tons/year
CO	13.6 lbs/hour	7.8 tons/year
NOx	47.9 lbs/hour	27.3 tons/year
VOC	3.5 lbs/hour	2.0 tons/year

Condition #20 sets the opacity limits for the generator, ICGF-529B as 20% and 30%.

Condition #25 sets the sulfur limit for the distillate oil burned in the generators at 0.5%.

Condition #26 describes the proper operation and maintenance of the generators.

Condition #27 describes the training of generator operators and the retention of training records.

Condition #28 lists the required records to show generator compliance with the permit.

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-40-900, Existing Source Standard for particulate emissions

9 VAC 5-40-930, Existing Source Standard for sulfur dioxide emissions

Periodic Monitoring

The monitoring and recordkeeping requirements in Condition 23 of the NSR permit have been modified to meet Part 70 requirements. The limited monitoring of emission units at the Dam Neck Annex is currently limited to the opacity observations of the fuel burning equipment.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include Names of fuel suppliers, dates of fuel deliveries, volume of each delivery, ASTM statement and the percent sulfur of each shipment of oil received. In addition, a logbook will be kept to record any instances of required Method 9 VEE's, the results of any such observations, any corrective action taken and the results of the corrective action.

Testing

The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The permit includes quarterly fuel quality reports to the Tidewater Regional Office.

Streamlined Requirements

There are no streamlined conditions for the generator operations.

EMISSION UNIT APPLICABLE REQUIREMENTS [CHMC-GRP1)]

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-40-3260, Emission Standards for solvent metal cleaning operations (Article 24)

Periodic Monitoring

The monitoring and recordkeeping requirements have been modified to meet Part 70 requirements. The limited monitoring of emission units at the Dam Neck Annex is currently limited to a visual examination of the solvent metal cleaning equipment.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring required by the permit. These records include tracking of waste solvent disposal, shipping records and a logbook to record all visual examinations of solvent metal cleaning units, the results of any observations, and that the operating procedures labels and covers are in place.

EMISSION UNIT APPLICABLE REQUIREMENTS [GSTA-575)]

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-40-5220E, Emission Standards for Petroleum Liquid Storage and Transfer Operation (Article 37)

Periodic Monitoring

The monitoring and recordkeeping requirements have been modified to meet Part 70 requirements. The limited monitoring of emission units at the Dam Neck Annex is currently limited to a visual inspection of a gasoline delivery with Stage 1 vapor recovery system to determine if the equipment is operating as required by the regulations.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring required by the permit. These records include a logbook to record all visual inspections of the Stage 1 vapor recovery system and the results of the observations.

EMISSION UNIT APPLICABLE REQUIREMENTS [WOOD-336, WOOD-526 AND WOOD-619]

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-40-2270A, Emission Standards for Woodworking Operations (Article 17)

Periodic Monitoring

The monitoring and recordkeeping requirements have been modified to meet Part 70 requirements. The limited monitoring of emission units at the Dam Neck Annex currently includes a visual inspection of the cyclone dust collection system to ensure structural integrity and opacity observations.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring required by the permit. These records include a logbook to record all visual inspections of the Stage 1 vapor recovery system and the results of the observations.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110, that apply to all Federal operating permit sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Permit Expiration

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by '§10.1-1185 of the *Code of Virginia*, and the "Department of Environmental Quality Agency Policy Statement NO. 3-2001".

This general conditions cites the entire Article(s) that follow:

- B.2. Article 1 (9 VAC 5-80-50 et seq.), Part II of 9 VAC 5 Chapter 80. <u>Federal Permits for</u> Stationary Sources
- B.3. Article 1 (9 VAC 5-80-50 et seq.), Part II of 9 VAC 5 Chapter 80. <u>Federal Permits for Stationary Sources</u>

This general condition cites the sections that follow:

- B. 9 VAC 5-80-80. "Application"
- B.2. 9 VAC 5-80-150. "Action on Permit Applications"
- B.3. 9 VAC 5-80-80. "Application"
- B.4. 9 VAC 5-80-80. "Application"
- B.4. 9 VAC 5-80-140. "Permit Shield"
- B.5. 9 VAC 5-80-80. "Application"

Failure/Malfunction Reporting

Section 9 VAC 5-20-180 requires malfunction and excess emissions reporting within 4 hours. Section 9 VAC 5-80-250 also requires malfunction reporting; however, reporting is required within 2 days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to this section including Title 5 facilities. Section 9 VAC 5-80-250 is from the Title 5 regulations. Title 5 facilities are subject to both Sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within 4 day time business hours of the malfunction.

In order for emissions units to be relieved from the requirement to make a written report in 14 days, the emission units must have continuous monitors and the continuous monitors must meet the requirements of 9 VAC 5-50-410 or 9 VAC 5-40-41.

This general condition cites the sections that follow:

F. 9 VAC 5-40-50. Notification, Records and Reporting F. 9 VAC 5-50-50. Notification, Records and Reporting F.1. 9 VAC 5-40-50. Notification, Records and Reporting F.1. 9 VAC 5-50-50. Notification, Records and Reporting 9 VAC 5-40-50. Notification, Records and Reporting F.2. F.2. 9 VAC 5-50-50. Notification, Records and Reporting F.3. 9 VAC 5-40-50. Notification, Records and Reporting 9 VAC 5-40-41. Emissions Monitoring Procedures for Existing Sources F.3. F.3.a. 9 VAC 5-40-41. Emissions Monitoring Procedures for Existing Sources]

This general condition contains a citation from the Code of Federal Regulations as follows: F.2.a. 40 CFR 60.13 (h). Monitoring Requirements.

U. Failure/Malfunction Reporting

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in section 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

This general condition cites the sections that follow:

U.2.d. 9 VAC 5-80-110. Permit Content

U.2.d. 9 VAC 5-20-180. Facility and Control Equipment Maintenance or Malfunction

STATE ONLY APPLICABLE REQUIREMENTS

The following Virginia Administrative Codes have specific requirements only enforceable by the State and have been identified as applicable by the applicant:

9 VAC 5 Chapter 50, Part II, Article 2: Standards of Performance for Odorous Emissions (Rule 5-2)

9 VAC 5 Chapter 50, Part II, Article 3: Standards of Performance for Toxic Pollutants (Rule 5-3)

FUTURE APPLICABLE REQUIREMENTS

The facility has no other requirements that will apply in the future. All applicable requirements for the emission units at the Dam Neck Annex are contained in the permit at this time.

INAPPLICABLE REQUIREMENTS

The facility has identified the following inapplicable requirements in their application. 9 VAC 5-40-3860, Automobile and Light Duty Truck Coating (Article 28) 9 VAC 5-40-4760, Miscellaneous Metal Parts and Products Coating (Article 34)

The following statement about the opacity startup, shut down, and malfunction exclusions should be included in all title V permit that have existing sources with opacity requirements. If a facility has a state operating permit this section may have to be included in the stream lined section of the statement of basis. If a facility does not have any existing sources the opacity exclusion statement would not be included.

The startup, shut down, and malfunction opacity exclusion listed in 9 VAC 5-40-20 A 3 cannot be included in any Title V permit. This portion of the regulation is not part of the federally approved state implementation plan. The opacity standard applies to existing sources at all times including startup, shutdown, and malfunction. Opacity exceedances during malfunction can be affirmatively defended provided all requirements of the affirmative defense section of this permit are met. Opacity exceedances during startup and shut down will be reviewed with enforcement discretion using the requirements of 9 VAC 5-40-20 E, which state that "At all times, including periods of startup, shutdown, soot blowing and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions."

COMPLIANCE PLAN

The Dam Neck Annex is not subject to a compliance plan at this time.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the

Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
BOIL-153	boiler	9 VAC 5-80-720C	PM, PM10, CO, NOx, SO2, VOC	natural gas 0.3 to 10 mmBtu/Hour
BOIL-187A	boiler	9 VAC 5-80-720C	PM, PM10, CO, NOx, SO2, VOC	natural gas 0.3 to 10 mmBtu/Hour
BOIL-187B	boiler	9 VAC 5-80-720C	PM, PM10, CO, NOx, SO2, VOC	natural gas 0.3 to 10 mmBtu/Hour
BOIL-187C	boiler	9 VAC 5-80-720C	PM, PM10, CO, NOx, SO2, VOC	natural gas 0.3 to 10 mmBtu/Hour
BOIL-194A	boiler	9 VAC 5-80-720C	PM, PM10, CO, NOx, SO2, VOC	natural gas 0.3 to 10 mmBtu/Hour
BOIL-194B	boiler	9 VAC 5-80-720C	PM, PM10, CO, NOx, SO2, VOC	natural gas 0.3 to 10 mmBtu/Hour
BOIL-199A	boiler	9 VAC 5-80-720C	PM, PM10, CO, NOx, SO2, VOC	natural gas 0.3 to 10 mmBtu/Hour
BOIL-199B	boiler	9 VAC 5-80-720C	PM, PM10, CO, NOx, SO2, VOC	natural gas 0.3 to 10 mmBtu/Hour
BOIL-202A	boiler	9 VAC 5-80-720C	PM, PM10, CO, NOx, SO2, VOC PM, PM10, CO,	natural gas 0.3 to 10 mmBtu/Hour natural gas 0.3 to 10
BOIL-202B	boiler	9 VAC 5-80-720C	NOx, SO2, VOC PM, PM10, CO,	mmBtu/Hour natural gas 0.3 to 10
BOIL-205A	boiler	9 VAC 5-80-720C	NOx, SO2, VOC PM, PM10, CO,	mmBtu/Hour natural gas 0.3 to 10
BOIL-205B	boiler	9 VAC 5-80-720C	NOx, SO2, VOC PM, PM10, CO,	mmBtu/Hour natural gas 0.3 to 10
BOIL-218A	boiler	9 VAC 5-80-720C	NOx, SO2, VOC PM, PM10, CO,	mmBtu/Hour natural gas 0.3 to 10
BOIL-218B	boiler	9 VAC 5-80-720C	NOx, SO2, VOC PM, PM10, CO,	mmBtu/Hour natural gas 0.3 to 10
BOIL-221A	boiler	9 VAC 5-80-720C	NOx, SO2, VOC PM, PM10, CO,	mmBtu/Hour natural gas 0.3 to 10
BOIL-221B BOIL-225A	boiler boiler	9 VAC 5-80-720C 9 VAC 5-80-720C	NOx, SO2, VOC PM, PM10, CO,	mmBtu/Hour natural gas 0.3 to 10
BOIL-225B	boiler	9 VAC 5-80-720C	NOx, SO2, VOC PM, PM10, CO,	mmBtu/Hour natural gas 0.3 to 10
BOIL-225C	boiler	9 VAC 5-80-720C	NOx, SO2, VOC PM, PM10, CO,	mmBtu/Hour natural gas 0.3 to 10
BOIL-226A	boiler	9 VAC 5-80-720C	NOx, SO2, VOC PM, PM10, CO,	mmBtu/Hour natural gas 0.3 to 10
BOIL-226B	boiler	9 VAC 5-80-720C	NOx, SO2, VOC PM, PM10, CO,	mmBtu/Hour natural gas 0.3 to 10
		111233001200	NOx, SO2, VOC	mmBtu/Hour

	T	1	1	Tuge 12
BOIL-227	boiler	9 VAC 5-80-720C	PM, PM10, CO,	natural gas 0.3 to 10 mmBtu/Hour
			NOx, SO2, VOC	
BOIL-228	boiler	9 VAC 5-80-720C	PM, PM10, CO,	natural gas 0.3 to 10
			NOx, SO2, VOC	mmBtu/Hour
BOIL-229	boiler	9 VAC 5-80-720C	PM, PM10, CO,	natural gas 0.3 to 10
2012 220	201101	0 1110 0 00 1200	NOx, SO2, VOC	mmBtu/Hour
BOIL-230	boiler	9 VAC 5-80-720C	PM, PM10, CO,	natural gas 0.3 to 10
DOIL 200	bonci	3 VAC 3 00 120C	NOx, SO2, VOC	mmBtu/Hour
DOIL 991	hailan	0 VA C 5 00 790C	PM, PM10, CO,	natural gas 0.3 to 10
BOIL-231	boiler	9 VAC 5-80-720C	NOx, SO2, VOC	mmBtu/Hour
DOIL 000	1 1	0 1/4 C 5 00 700 C	PM, PM10, CO,	natural gas 0.3 to 10
BOIL-232	boiler	9 VAC 5-80-720C	NOx, SO2, VOC	mmBtu/Hour
			PM, PM10, CO,	natural gas 0.3 to 10
BOIL-233	boiler	9 VAC 5-80-720C	NOx, SO2, VOC	mmBtu/Hour
			PM, PM10, CO,	natural gas 0.3 to 10
BOIL-234A	boiler	9 VAC 5-80-720C	NOx, SO2, VOC	mmBtu/Hour
BOIL-234B	boiler	9 VAC 5-80-720C	PM, PM10, CO,	natural gas 0.3 to 10
			NOx, SO2, VOC	mmBtu/Hour
BOIL-235A	boiler	9 VAC 5-80-720C	PM, PM10, CO,	natural gas 0.3 to 10
2012 20011	201101	0 1110 0 00 1200	NOx, SO2, VOC	mmBtu/Hour
BOIL-235B	boiler	9 VAC 5-80-720C	PM, PM10, CO,	natural gas 0.3 to 10
DOIL-233D	Doller	9 VAC 3-60-720C	NOx, SO2, VOC	mmBtu/Hour
DOIL OOOA	1 . 1	0.1/4.0.7.00.7000	PM, PM10, CO,	natural gas 0.3 to 10
BOIL-236A	boiler	9 VAC 5-80-720C	NOx, SO2, VOC	mmBtu/Hour
			PM, PM10, CO,	natural gas 0.3 to 10
BOIL-236B	boiler	9 VAC 5-80-720C	NOx, SO2, VOC	mmBtu/Hour
			PM, PM10, CO,	natural gas 0.3 to 10
BOIL-237A	boiler	9 VAC 5-80-720C	NOx, SO2, VOC	mmBtu/Hour
			PM, PM10, CO,	natural gas 0.3 to 10
BOIL-237B	boiler	9 VAC 5-80-720C	NOx, SO2, VOC	mmBtu/Hour
-				
BOIL-241	boiler	9 VAC 5-80-720C	PM, PM10, CO,	natural gas 0.3 to 10
			NOx, SO2, VOC	mmBtu/Hour
BOIL-305	boiler	9 VAC 5-80-720C	PM, PM10, CO,	natural gas 0.3 to 10
			NOx, SO2, VOC	mmBtu/Hour
BOIL-306	boiler	9 VAC 5-80-720C	PM, PM10, CO,	natural gas 0.3 to 10
DOIL 300	bonci	3 VAC 3 00 120C	NOx, SO2, VOC	mmBtu/Hour
BOIL-310A	boiler	9 VAC 5-80-720C	PM, PM10, CO,	natural gas 0.3 to 10
DOIL-310A	Donei	9 VAC 3-60-720C	NOx, SO2, VOC	mmBtu/Hour
DOIL 010D	1 1	0 1/4 C 5 00 700 C	PM, PM10, CO,	natural gas 0.3 to 10
BOIL-310B	boiler	9 VAC 5-80-720C	NOx, SO2, VOC	mmBtu/Hour
			PM, PM10, CO,	natural gas 0.3 to 10
BOIL-311	boiler	9 VAC 5-80-720C	NOx, SO2, VOC	mmBtu/Hour
			PM, PM10, CO,	natural gas 0.3 to 10
BOIL-350	boiler	9 VAC 5-80-720C	NOx, SO2, VOC	mmBtu/Hour
			PM, PM10, CO,	
BOIL-354A	boiler	9 VAC 5-80-720C		natural gas 0.3 to 10
			NOx, SO2, VOC	mmBtu/Hour
BOIL-355A	boiler	9 VAC 5-80-720C	PM, PM10, CO,	natural gas 0.3 to 10
			NOx, SO2, VOC	mmBtu/Hour
BOIL-355B	boiler	9 VAC 5-80-720C	PM, PM10, CO,	natural gas 0.3 to 10
DOIL GOOD	Dones	0 1110 0 00 1200	NOx, SO2, VOC	mmBtu/Hour

		1	1	1 ugc 10
BOIL-358A	boiler	9 VAC 5-80-720C	PM, PM10, CO,	natural gas 0.3 to 10
			NOx, SO2, VOC	mmBtu/Hour
BOIL-358B	boiler	9 VAC 5-80-720C	PM, PM10, CO,	natural gas 0.3 to 10
			NOx, SO2, VOC	mmBtu/Hour
BOIL-358C	boiler	9 VAC 5-80-720C	PM, PM10, CO,	natural gas 0.3 to 10
2012 0000	201101	0 1110 0 00 1200	NOx, SO2, VOC	mmBtu/Hour
BOIL-420A	boiler	9 VAC 5-80-720C	PM, PM10, CO,	natural gas 0.3 to 10
DOIL 420A	bonci	3 VAC 3 00 120C	NOx, SO2, VOC	mmBtu/Hour
BOIL-420B	boiler	9 VAC 5-80-720C	PM, PM10, CO,	natural gas 0.3 to 10
DOIL-420D	bonei	9 VAC 3-60-720C	NOx, SO2, VOC	mmBtu/Hour
DOIL 490C	h - dl - n	0.1/4.0 5.00.7000	PM, PM10, CO,	natural gas 0.3 to 10
BOIL-420C	boiler	9 VAC 5-80-720C	NOx, SO2, VOC	mmBtu/Hour
DOH 400	1 1	0 1/4 C 5 00 700 C	PM, PM10, CO,	natural gas 0.3 to 10
BOIL-430	boiler	9 VAC 5-80-720C	NOx, SO2, VOC	mmBtu/Hour
DOTT 1221		0.774.67.00.700.6	PM, PM10, CO,	natural gas 0.3 to 10
BOIL-455A	boiler	9 VAC 5-80-720C	NOx, SO2, VOC	mmBtu/Hour
			PM, PM10, CO,	natural gas 0.3 to 10
BOIL-455B	boiler	9 VAC 5-80-720C	NOx, SO2, VOC	mmBtu/Hour
			PM, PM10, CO,	natural gas 0.3 to 10
BOIL-455C	boiler	9 VAC 5-80-720C	NOx, SO2, VOC	mmBtu/Hour
			PM, PM10, CO,	
BOIL-462	boiler	9 VAC 5-80-720C		natural gas 0.3 to 10 mmBtu/Hour
			NOx, SO2, VOC	
BOIL-475	boiler	9 VAC 5-80-720C	PM, PM10, CO,	natural gas 0.3 to 10
			NOx, SO2, VOC	mmBtu/Hour
BOIL-502A	boiler	9 VAC 5-80-720C	PM, PM10, CO,	natural gas 0.3 to 10
BOIL OUL! I	Dones	0 1710 0 00 7200	NOx, SO2, VOC	mmBtu/Hour
BOIL-502B	boiler	9 VAC 5-80-720C	PM, PM10, CO,	natural gas 0.3 to 10
DOIL 302D	boner	0 1110 0 00 1200	NOx, SO2, VOC	mmBtu/Hour
BOIL-504A	boiler	9 VAC 5-80-720C	PM, PM10, CO,	natural gas 0.3 to 10
DOIL-304A	bollel	9 VAC 3-60-720C	NOx, SO2, VOC	mmBtu/Hour
DOIL FOAD	hailan	9 VAC 5-80-720C	PM, PM10, CO,	natural gas 0.3 to 10
BOIL-504B	boiler	9 VAC 5-80-720C	NOx, SO2, VOC	mmBtu/Hour
DOIL FOAG	1 1	0 1/4 C 5 00 700 C	PM, PM10, CO,	natural gas 0.3 to 10
BOIL-504C	boiler	9 VAC 5-80-720C	NOx, SO2, VOC	mmBtu/Hour
			PM, PM10, CO,	natural gas 0.3 to 10
BOIL-508A	boiler	9 VAC 5-80-720C	NOx, SO2, VOC	mmBtu/Hour
			PM, PM10, CO,	natural gas 0.3 to 10
BOIL-508B	boiler	9 VAC 5-80-720C	NOx, SO2, VOC	mmBtu/Hour
			PM, PM10, CO,	natural gas 0.3 to 10
BOIL-508C	boiler	9 VAC 5-80-720C	NOx, SO2, VOC	mmBtu/Hour
			PM, PM10, CO,	natural gas 0.3 to 10
BOIL-525A	boiler	9 VAC 5-80-720C	NOx, SO2, VOC	mmBtu/Hour
BOIL-525B	boiler	9 VAC 5-80-720C	PM, PM10, CO,	natural gas 0.3 to 10
			NOx, SO2, VOC	mmBtu/Hour
BOIL-525C	boiler	9 VAC 5-80-720C	PM, PM10, CO,	natural gas 0.3 to 10
			NOx, SO2, VOC	mmBtu/Hour
BOIL-525D	boiler	9 VAC 5-80-720C	PM, PM10, CO,	natural gas 0.3 to 10
3012 0202		1 1110 0 00 1200	NOx, SO2, VOC	mmBtu/Hour
BOIL-525E	boiler	9 VAC 5-80-720C	PM, PM10, CO,	natural gas 0.3 to 10
DOIL OLUE	Dones	0 110 0 00-1200	NOx, SO2, VOC	mmBtu/Hour

				Page 14
BOIL-543	boiler	9 VAC 5-80-720C	PM, PM10, CO, NOx, SO2, VOC	natural gas 0.3 to 10 mmBtu/Hour
			PM, PM10, CO,	natural gas 0.3 to 10
BOIL-575	boiler	9 VAC 5-80-720C	NOx, SO2, VOC	mmBtu/Hour
	diesel engine test		PM, PM10, CO,	Illilibtu/Tioui
ENGT-356	dynamometer	9 VAC 5-80-720B	NOx, SO2, VOC	N/A
FIRI-311A	7-meter room	9 VAC 5-80-720B	Lead, PM, PM10	N/A
FIRI-350	Multi-story trainer	9 VAC 5-80-720B	Lead, PM, PM10	N/A
FIRO-304	Baffle range(no roof)	9 VAC 5-80-720B	Lead, PM, PM10	N/A
FIRO-327	Rifle Range	9 VAC 5-80-720B	Lead, PM, PM10	N/A
FIRO-366	Pistol Range	9 VAC 5-80-720B	Lead, PM, PM10	N/A
ICGF-127B	small generator	9 VAC 5-80-720B	NOx, CO, VOC	N/A
ICGF-217	small generator	9 VAC 5-80-720B	NOx, CO, VOC	N/A
ICGF-310	small generator	9 VAC 5-80-720B	NOx, CO, VOC	N/A
ICGF-329	small generator	9 VAC 5-80-720B	NOx, CO, VOC	N/A
ICGF-352	small generator	9 VAC 5-80-720B	NOx, CO, VOC	N/A
ICGF-354	small generator	9 VAC 5-80-720B	NOx, CO, VOC	N/A
ICGF-358	small generator	9 VAC 5-80-720B	NOx, CO, VOC	N/A
ICGF-374	small generator	9 VAC 5-80-720B	NOx, CO, VOC	N/A
ICGF-420A	small generator	9 VAC 5-80-720B	NOx, CO, VOC	N/A
ICGF-420B	small generator	9 VAC 5-80-720B	NOx, CO, VOC	N/A
ICGF-470A	small generator	9 VAC 5-80-720B	NOx, CO, VOC	N/A
ICGF-470B	small generator	9 VAC 5-80-720B	NOx, CO, VOC	N/A
ICGF-488	small generator	9 VAC 5-80-720B	NOx, CO, VOC	N/A
ICGF-501	small generator	9 VAC 5-80-720B	NOx, CO, VOC	N/A
ICGF-525	small generator	9 VAC 5-80-720B	NOx, CO, VOC	N/A
ICGF-527	small generator	9 VAC 5-80-720B	NOx, CO, VOC	N/A
ICGF-529A	small generator	9 VAC 5-80-720B	NOx, CO, VOC	N/A
ICGF-542	small generator	9 VAC 5-80-720B	NOx, CO, VOC	N/A
ICGF-551	small generator	9 VAC 5-80-720B	NOx, CO, VOC	N/A
ICGF-591	small generator	9 VAC 5-80-720B	NOx, CO, VOC	N/A
ICGF-612	small generator	9 VAC 5-80-720B	NOx, CO, VOC	N/A
ICGF-617	small generator	9 VAC 5-80-720B	NOx, CO, VOC	N/A
OVNC-354	curing oven	9 VAC 5-80-720B	VOC	N/A
PHOT-127A	large developer	9 VAC 5-80-720B	VOC	N/A
PHOT-127B	small developer	9 VAC 5-80-720B	VOC	N/A
PHOT-127D	cleaning process	9 VAC 5-80-720B	VOC	N/A
PHOT-127E	photo preparation	9 VAC 5-80-720B	VOC	N/A
PHOT-355A	large developer	9 VAC 5-80-720B	VOC	N/A
PHOT-355B	small developer	9 VAC 5-80-720B	VOC	N/A
PHOT-355D	cleaning process	9 VAC 5-80-720B	VOC	N/A
PHOT-355E	photo preparation	9 VAC 5-80-720B	VOC	N/A
PNTS-354A	North paint booth	9 VAC 5-80-720B	VOC, PM10	N/A
PNTS-354B	South paint booth	9 VAC 5-80-720B	VOC, PM10	N/A
TNKA-127B	distillate tank	9 VAC 5-80-720B	VOC	N/A
TNKA-217	distillate tank	9 VAC 5-80-720B	VOC	N/A
TNKA-352	distillate tank	9 VAC 5-80-720B	VOC	N/A
TNKA-354	waste oil	9 VAC 5-80-720B	VOC	N/A
TNKA-356	gasoline	9 VAC 5-80-720B	VOC	N/A

				1 age 13
TNKA-374	distillate tank	9 VAC 5-80-720B	VOC	N/A
TNKA-420	distillate tank	9 VAC 5-80-720B	VOC	N/A
TNKA-442	distillate tank	9 VAC 5-80-720B	VOC	N/A
TNKA-462	waste oil	9 VAC 5-80-720B	VOC	N/A
TNKA-475B	distillate tank	9 VAC 5-80-720B	VOC	N/A
TNKA-488A	distillate tank	9 VAC 5-80-720B	VOC	N/A
TNKA-501	distillate tank	9 VAC 5-80-720B	VOC	N/A
TNKA-527A	waste oil	9 VAC 5-80-720B	VOC	N/A
TNKA-527B	distillate tank	9 VAC 5-80-720B	VOC	N/A
TNKA-529A	distillate tank	9 VAC 5-80-720B	VOC	N/A
TNKA-529B	distillate tank	9 VAC 5-80-720B	VOC	N/A
TNKA-542	distillate tank	9 VAC 5-80-720B	VOC	N/A
TNKA-611	No. 4 fuel oil (1952)	9 VAC 5-80-720B	VOC	N/A
TNKA-612	No. 4 fuel oil	9 VAC 5-80-720B	VOC	N/A
TNKU-127S	distillate tank	9 VAC 5-80-720B	VOC	N/A
TNKU-311A	distillate tank	9 VAC 5-80-720B	VOC	N/A
TNKU-311B	distillate tank	9 VAC 5-80-720B	VOC	N/A
TNKU-313A	gasoline	9 VAC 5-80-720B	VOC	N/A
TNKU-313B	gasoline	9 VAC 5-80-720B	VOC	N/A
TNKU-313C	distillate tank	9 VAC 5-80-720B	VOC	N/A
TNKU-355	mineral oil	9 VAC 5-80-720B	VOC	N/A
TNKU-430	distillate tank	9 VAC 5-80-720B	VOC	N/A
TNKU-469A	distillate tank	9 VAC 5-80-720B	VOC	N/A
TNKU-469B	distillate tank	9 VAC 5-80-720B	VOC	N/A
TNKU-470	distillate tank	9 VAC 5-80-720B	VOC	N/A
TNKU-527A	gasoline	9 VAC 5-80-720B	VOC	N/A
TNKU-527B	distillate tank	9 VAC 5-80-720B	VOC	N/A
TNKU-575A	gasoline	9 VAC 5-80-720B	VOC	N/A
TNKU-575B	gasoline	9 VAC 5-80-720B	VOC	N/A
TNKU-575C	gasoline	9 VAC 5-80-720B	VOC	N/A
WELD-305	general welding	9 VAC 5-80-720B	PM10	N/A
WELD-336	general welding	9 VAC 5-80-720B	PM10	N/A
WELD-355	general welding	9 VAC 5-80-720B	PM10	N/A
WELD-462	general welding	9 VAC 5-80-720B	PM10	N/A
WELD-526	general welding	9 VAC 5-80-720B	PM10	N/A
WSTL-354A	Oil/Water separator	9 VAC 5-80-720B	VOC	N/A
WSTL-354B	Oil/Water separator	9 VAC 5-80-720B	VOC	N/A
WSTL-355	Oil/Water separator	9 VAC 5-80-720B	VOC	N/A
WSTL-462	Oil/Water separator	9 VAC 5-80-720B	VOC	N/A
WSTL-527	Oil/Water separator	9 VAC 5-80-720B	VOC	N/A
WSTL-529	Oil/Water separator	9 VAC 5-80-720B	VOC	N/A
WSTS-420	Paper shredding	9 VAC 5-80-720B	PM, PM10	N/A
WSTL-470A	Paper shredding	9 VAC 5-80-720B	PM, PM10	N/A
WSTL-470B	Paper shredding	9 VAC 5-80-720B	PM, PM10	N/A

The citation criteria for insignificant activities are as follows:

⁹ VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application

⁹ VAC 5-80-720 B - Insignificant due to emission levels

⁹ VAC 5-80-720 C - Insignificant due to size or production rate

Commander, Navy Region, Mid-Atlantic TRO-60280 Statement of Basis Page 16

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

The proposed permi	t wi	ll be plac	ed on publ	ic notice in the	Virginian-Pilot	from
March 13, 2003	to	April 1	2, 2003			